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REMARKS

The Applicant wishes to thank the Examiner for the detailed remarks, allowance of claims 21, 22, and 24, and allowability of claims 9, 10, 15, 16, 19, 28, and 29.

Applicant has amended claims 9, 15, and 18 to overcome the §112, second paragraph rejection. Claim 19 does not include the redundancy indicated by the Examiner and is therefore considered to be properly allowable.

The Examiner rejected claims 1-20, 23, and 25-33 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. The Examiner states the retainer legs do not flex when first engaged in the groove, rather the bridge portion flexes at an angle not perpendicular and perhaps leg portions adjacent the bridge, but only after the bridge portion engages the retainer feature. Applicant respectfully disagrees with the Examiner's interpretation. Applicant's written specification (see Figure 8 specifically) illustrates that the retainer is moved away from the retention feature (arrow Y) so that the aperture of the retainer clears the retention feature when the retainer is removed from (or inserted into) the groove 42 (arrow Z). Thus, the retainer is positioned at the non-perpendicular angle to clear the retention feature to remove and to insert the retainer. Therefore, the claims are not indefinite and are properly allowable.

The Examiner rejected claims 1, 2, 4-7, 11-13, 17, 18, 20, 23, 25-27, and 30-33 under 35 U.S.C. §103(a) as being unpatentable over *Martin* in view of *Mall*. The combination of *Martin* and *Mall* does not disclose a retainer that engages a housing retainer groove at an angle that is not perpendicular to the housing axis as recited in Applicant's claims. The retainer (40) of *Martin* engages the grooves (36) perpendicular to the housing (14) axis, and the retainer (36) of *Mall*

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engages the grooves (38, 40) perpendicular to the housing (28) axis. Accordingly, claims 1, 2, 4-7, 11-15, 17, 18, 20, 23, 25-27, and 30-33 are properly allowable.

Additionally, the proposed combination of *Martin* and *Mall* does not disclose that the engagement feature extends from the housing and that the retainer passes over the engagement feature during insertion as recited in Applicant's claims. The Examiner contends that the retainer legs of *Mall* flex over a rigid plane of abutment 50 upon insertion. Applicant respectfully disagrees, as this is contrary to the disclosure of *Mall*. Figure 2 of *Mall* shows the retainer (36) in an intermediate position as the retainer legs slide through the slots (38, 40) and are flexed radially inward of the abutments (50). Figure 4 of *Mall* shows the retainer in a final position wherein the abutments (50) are received against portions (52, 54) to secure the retainer in the slots (38, 40). Thus, the retainer (36) moves under (i.e., inward of) the abutment (50) and does not even flex over the abutment (50) as Examiner contends. Accordingly, claims 1, 2, 4-7, 11-13, 17, 18, 20, 23, 25-27, and 30-33 are properly allowable.

The Examiner rejected claim 3 under 35 U.S.C. §103(a) as being unpatentable over *Martin* in view of *Mall* and further in view of *Dauenbaugh*. In addition to the reasons stated above against modification of *Martin* with *Mall*, there is no motivation to modify *Martin* with *Dauenbaugh*. *Martin* discloses that the cylinder (14) has a bore (28) that rotatably receives the plug (12) such that the plug (12) can rotate with the cam (50). See Col.3, lines 7-8 and lines 65-66. Providing an extension and groove as taught in *Dauenbaugh* would prevent rotation of the plug (12) and render the lock of *Martin* inoperable. It is improper to modify the base reference in a way that would ruin the goal or function of the base reference. Accordingly, claim 3 is properly allowable.

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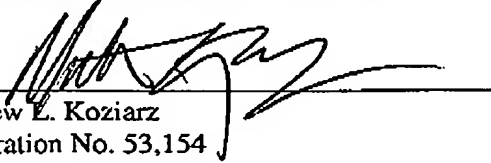
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The Examiner rejected claims 8 and 14 under 35 U.S.C. §103(a) as being unpatentable over *Martin* in view of *Mall* and further in view of either *Dauenbaugh* or *Myers*. In addition to the reasons stated above against the combination of *Martin*, *Mull* and *Dauenbaugh*, there is no motivation to modify *Martin* with *Dauenbaugh* or *Myers* as proposed. The clip (40) of *Martin* is simply a bent wire that holds the plug (12) in the cylinder (14). A lid (46) retains the clip (40) in the bores (36). Since the lid (46) retains the clip (40), there would be no need to modify it as proposed. Furthermore, modifying the clip (40) to provide an aperture and a bridge would complicate the clip (40), contrary to the teaching that the clip (40) can have a simplified configuration that includes a single prong rather than two prongs. Therefore, the proposed combination relies on knowledge imparted only from Applicant's disclosure and is impermissible use of hindsight in attempt to produce Applicant's invention. Accordingly, claims 8 and 14 are properly allowable.

Respectfully submitted,

CARLSON, GASKEY & OLDS, P.C.


Matthew L. Koziarz
Registration No. 53,154
Attorneys for Applicant
400 West Maple, Suite 350
Birmingham, Michigan 48009
(248) 988-8360

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